

K R A S K I N, L E S S E & C O S S O N, L L P
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DOCKET FILE COPY ORIGINAL

October 29, 1999

Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RECEIVED
OCT 29 1999
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Petition for Temporary, Limited Waiver
CC Docket No. 98-170
Filed October 27, 1999

Dear Ms. Salas:

On behalf of Brazos Telephone Cooperative, Inc. and Brazos Telecommunications, Inc., we are transmitting the Declarations of Ted Scobee bearing an original signature. On October 27, 1999, the referenced Petition was filed with the Declarations bearing a facsimile signature.

Please associate this Declaration with the captioned Request.

Should you have any questions, please contact this office.

Very truly yours,



Margaret Nyland

Attachment

No. of Copies rec'd
List ABCDE

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BRAZOS TELEPHONE COOPERATIVE, INC.

Brazos Telephone Cooperative, Inc. (the "Company") provides exchange and exchange access services to approximately 1,231 lines in Texas. The Company is a rural telephone company under the Communications Act of 1934 as amended. The Company utilizes UDP for the provision of billing software and uses INS as its clearinghouse for casual calling and alternate service provider billing and collection arrangements. The Company contacted its billing vendor with respect to the FCC's Truth-in-Billing ("TIB") requirements in June, 1999. Since that time, the Company has had discussions with its billing vendor regarding TIB Rule compliance. Because of backlog and/or programming demands (including those arising from Year 2000 issues), the vendor has indicated that it is not capable of providing the necessary software updates required to comply with inquiry contact requirements at this time. TIB implementation is further complicated by the fact that the Company currently provides billing and collection services for casual calling and alternate service providers. The Company is not yet capable of listing inquiry contacts on bills for these providers. Accordingly, the Company requests that this requirement be extended to April 1, 2000, the date that certain other TIB rule requirements are to be effective. The Company will, however, engage in proper testing and will continue to work with its clearinghouse and software vendor to coordinate the resolution of this issue. Until the requested waiver expires, the Company will continue to provide its contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

DECLARATION OF TED SCOBEE

I, Ted Scobee, Assistant Manager of Brazos Telephone Cooperative, Inc. ("Brazos"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein regarding Brazos is true and accurate to the best of my knowledge, information, and belief.

Date: 10-26-99

By: 

Ted Scobee
Assistant Manager

BRAZOS TELECOMMUNICATIONS, INC.

Brazo Telecommunications, Inc.(the "Company") provides exchange and exchange access services to approximately 4,295 lines in Texas. The Company is a rural telephone company under the Communications Act of 1934 as amended. The Company utilizes UDP for the provision of billing software and uses INS as its clearinghouse for casual calling and alternate service provider billing and collection arrangements. The Company contacted its billing vendor with respect to the FCC's Truth-in-Billing ("TIB") requirements in June, 1999. Since that time, the Company has had discussions with its billing vendor regarding TIB Rule compliance. Because of backlog and/or programming demands (including those arising from Year 2000 issues), the vendor has indicated that it is not capable of providing the necessary software updates required to comply with inquiry contact requirements at this time. TIB implementation is further complicated by the fact that the Company currently provides billing and collection services for casual calling and alternate service providers. The Company is not yet capable of listing inquiry contacts on bills for these providers. Accordingly, the Company requests that this requirement be extended to April 1, 2000, the date that certain other TIB rule requirements are to be effective. The Company will, however, engage in proper testing and will continue to work with its clearinghouse and software vendor to coordinate the resolution of this issue. Until the requested waiver expires, the Company will continue to provide its contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

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I, Ted Scobee, Assistant Manager of Brazos Telecommunications, Inc. ("Brazos"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein regarding Brazos is true and accurate to the best of my knowledge, information, and belief.

Date: 10-26-99

By:


Ted Scobee
Assistant Manager